

**LAW OFFICES OF JAMES R. DEVITA, PLLC**  
81 MAIN STREET, SUITE 504  
WHITE PLAINS, NEW YORK 10601-1719  
(914) 328-5000  
FAX (914) 946-5906  
E-Mail: [jdevita@jamesrdevitalaw.com](mailto:jdevita@jamesrdevitalaw.com)

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NEW YORK CITY OFFICE:  
217 BROADWAY, SUITE 707  
NEW YORK, NY 10007  
(212) 619-3730

March 30, 2020

**VIA ECF**

Honorable Paul B. Gardephe  
United States District Judge for the Southern District of New York  
United States Courthouse  
40 Centre St.  
New York, New York 10007

Re: *United States v. Gonzalez, et al.*, 18 Cr. 601 (PGG)

Dear Judge Broderick:

I writing to request an adjournment of the deadline for filing pretrial motions on behalf of my client in the above referenced case, Jean-Claud Okongo Landji, and his co-defendant Jibril Adamu, from March 31, 2020 to May 1, 2020. Thomas Dunn, Esq., counsel to Mr. Adamu, joins in this request.

As Your Honor will recall, Mr. Landji and Mr. Adamu are the two defendants who first appeared before Your Honor in connection with this case on October 30, 2019, after having been extradited from Croatia on October 17, 2017. Our pretrial motions are currently due tomorrow, March 31, 2020. As a result of the combination of the complete lockdown of MCC for over ten days beginning in late February related to the search for a weapon, and the current coronavirus quarantine, we have had extremely limited contact with our clients, solely over the telephone for a few short calls. In addition, the various measures taken by the Bureau of Prisons have deprived our clients of meaningful access to the discovery materials. Finally, the restrictions upon travel and access to our offices has made the preparation of motions logistically extremely difficult. I therefore respectfully request that the deadline for motions on behalf of Messrs. Landji and Adamu be extended to May 1, 2020.

Hon. Paul G. Gardephe

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I have discussed this request with Assistant United States Attorney Hellman, and he has no objection.

Respectfully submitted,

*s/James R. DeVita*

James R. DeVita

cc: Assistant United States Attorney Matthew Hellman (by ECF)  
Assistant United States Attorney Eleanor Tarlow (by ECF)